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BEFORE THE ARIZONA CORPORATION COMMISSION

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2000 DEC 29 A 11:16

CARL J. KUNASEK

Chairman

JIM IRVIN

Commissioner

WILLIAM A. MUNDELL

Commissioner

AZ CORP COMMISSION  
DOCUMENT CONTROL

IN THE MATTER OF THE GENERIC  
INVESTIGATIONS INTO U S WEST  
COMMUNICATIONS, INC.'S  
COMPLIANCE WITH CERTAIN  
WHOLESALE PRICING REQUIREMENTS  
FOR UNBUNDLED NETWORK ELEMENTS  
AND RESALE DISCOUNTS

DOCKET NO. T-00000A-00-0194

OBJECTION TO STAFF'S FOURTH SET  
OF DATA REQUESTS NOS. WD-4-97  
(C), (D) & (E); WD-4-117 (B),  
(D) & (F); AND WD-4-121

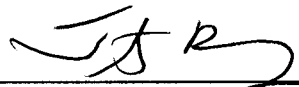
Qwest Corporation ("Qwest") objects to data request No. WD-4-97(C), (D) and (E), and No. WD-4-121 including all subparts on the grounds that they are overbroad and not reasonably calculated to lead to the discovery of information relevant to the issues in this proceeding. Specifically, the requests ask for information regarding a DSL service that is not provided by the regulated telecommunications company.

Qwest further objects to data request No. WD-4-117(B), (D) and (F) on the grounds that these subparts are overbroad and not reasonably calculated to lead to the discovery of information relevant to the issues in this proceeding. This data request asks for information relating to Qwest's revenues. The wholesale

1 pricing matter is based on costs, not revenues. Thus, the revenue  
2 information requested is not relevant.

3 DATED this 22<sup>nd</sup> day of December, 2000.

4 FENNEMORE CRAIG, P.C.

5  
6 By   
7 Timothy Berg  
8 Theresa Dwyer  
9 3003 North Central, Suite 2600  
Phoenix, Arizona 85012  
Attorneys for Qwest Corporation

10 ORIGINAL and ten copies of the  
11 foregoing filed this 29<sup>th</sup> day  
12 of December, 2000 with:

13 Docket Control  
14 ARIZONA CORPORATION COMMISSION  
15 1200 West Washington Street  
Phoenix, Arizona 85007

16 COPY of the foregoing hand-delivered  
17 this 29<sup>th</sup> day of December, 2000.

18 Chief Counsel  
19 Legal Division  
Arizona Corporation Commission  
1200 West Washington  
Phoenix, Arizona 85007

20 Deborah R. Scott, Director  
21 Utilities Division  
Arizona Corporation Commission  
22 1200 West Washington  
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23   
24 PHX/DRENPRO/1138231.1/67817.240